

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., *et al.*,<sup>1</sup> ) Case No. 01-1139 (JKF)  
) Jointly Administered  
Debtors. )  
) [Related Docket Nos. 9311, 9843]

**CERTIFICATION OF COUNSEL REGARDING  
STIPULATION CONCERNING WITHDRAWAL OF CLAIMS**

The undersigned hereby certifies that:

1. On September 1, 2005, the Debtors filed, the *Debtors' Thirteenth Omnibus Objection to 2,937 Unauthorized Claims (Substantive)* (Docket No. 9311) (the "Thirteenth Omnibus Objection").
2. On October 21, 2005, Speights & Runyan and the Debtors entered into the Stipulation Between the Debtors and Speights & Runyan Regarding the Withdrawal of Asbestos Property Damage Claims Lacking Proof of W. R. Grace Product Identification (Docket No. 9843) (the "Stipulation").

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc.), Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

3. The Stipulation agreed that Speights & Runyan would withdrawal all claims lacking product identification identified except for (a) claim numbers 9911 and 9914, (b) claims for buildings located in South Carolina, and (c) the 50 "Further Review Claims" for which Speights & Runyan could take up to 60 days, to and including December 16, 2005, to investigate whether or not it has evidence of a W. R. Grace asbestos-containing product was installed in the buildings.

4. The December 16, 2005, deadline has passed and Speights & Runyan has not identified any Further Review Claims.

5. Speights & Runyan has agreed to this form of Order.

6. The Debtors respectfully request that the Court enter the Order at its earliest convenience.

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7. Counsel for the Debtors are available, should the Court have any questions or concerns with respect to the foregoing.

Dated: January 7, 2006

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—and—

PACHULSKI, STANG, ZIEHL, YOUNG, JONES  
& WEINTRAUB P.C.



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